

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Independent Contractors of Maverick)	
Transportation, LLC, et al.)	
)	
Plaintiffs,)	
v.)	
)	No. 4:24-cv-00338-SEP
Great West Casualty Company)	
)	
Defendant.)	

MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE

COME NOW Plaintiffs Independent Contractors of Maverick Transportation, LLC and Dorian West (“**Plaintiffs**”) and, in support of their Motion for Leave, by and through undersigned counsel, and state the following:.

The manner in which undersigned counsel addressed the Court in his responses to the show cause orders displays lack of integrity and fidelity to the oath which he claims to espouse. Counsel is indefatigable in defense of his clients’ rights, but that excuses nothing about the reprehensible way he addressed the Court in his responses to the show cause orders.

To the extent the substance of Plaintiffs’ arguments in his responses to the Court’s show cause orders survive the manner in which he delivered those arguments, Plaintiffs do not equivocate. But counsel is ashamed and embarrassed and so sorry for the lack of respect he displayed in delivery of his arguments to this honorable Court.

Counsel will accept any punishment this honorable Court deems necessary to preserve the sanctity of this Court; at the same time respectfully request this honorable Court’s mercy that he be allowed

to continue to practice before this honorable Court, and the U.S. District Court of the Eastern District of Missouri, if just and proper.

Wherefore, counsel respectfully requests leave to file the attached apology to the Court.

Respectfully submitted,

DAN FINNEY LAW

/s/ Daniel Finney III

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